

137239

TO: MS. MELISSA WHITTINGTON (3HW41)
REMEDIAL PROJECT MANAGER
U.S. EPA REGION III
941 CHESTNUT STREET
PHILADELPHIA, PA 19107

03/02/94

DEAR MS. WHITTINGTON,

I AM DISAPPOINTED THAT THE PUBLIC MEETING SCHEDULED FOR MARCH 1ST HAS AGAIN BEEN POSTPONED DUE TO WEATHER PROBLEMS AS I HAD A COUPLE OF THINGS I WANTED TO STATE FOR THE RECORD. SINCE I AM UNSURE WHETHER OR NOT YOU WILL RESCHEDULE THIS MEETING I FELT I SHOULD WRITE TO YOU ABOUT MY CONCERNS.

SEVERAL DAYS AGO I RECEIVED YOUR MAILING DATED FEBRUARY 23, 1994 WITH THE ATTACHED "FACT" SHEET AND WAS DISAPPOINTED TO FIND THAT MUCH OF WHAT YOU STATE AS FACT IS NOTHING MORE THAN YOUR VIEW ON THE TOPIC. YOU SHOULD BE HONEST ENOUGH TO AT LEAST STATE THAT THIS IS YOUR SIDE OF THE STORY, NOT NECESSARILY "THE FACTS". IN PARTICULAR I HAVE PROBLEMS WITH THE FOLLOWING STATEMENTS:

UNDER THE HEADING: THE SITE POSES RISK:

" NO IMMEDIATE THREAT DOES NOT MEAN "SAFE". GROUND WATER AT THE SITE IS HIGHLY TOXIC. STUDIES HAVE SHOWN THAT CONTAMINATED GROUND WATER HAS MOVED OUTWARD FROM THE SITE."

YOUR STATEMENT MAKES IT SOUND AS IF THE WATER HAS MIGRATED AWAY FROM THE TRENCH AREA SINCE THE INITIAL CAP WAS INSTALLED YEARS AGO WHEN IN FACT YOU DO NOT KNOW WHETHER OR NOT THE MIGRATION OCCURRED PRIOR TO THE CAPPING. I BELIEVE IT OCCURRED PRIOR TO THE CAPPING AND ENGINEERING SCIENCE BELIEVES IT OCCURRED PRIOR TO THE CAP INSTALLATION. SECONDLY, THE "HIGHLY TOXIC GROUND WATER" IS REFERRING I BELIEVE TO THE AREA DIRECTLY IN THE MIDDLE OF THE BARREL TRENCH, NOT SOME WIDE SPREAD AREA.

FACT: "DELAYING THE CLEANUP OF HAZARDOUS WASTES CAN BE COSTLY..."

YOUR ASSUMPTIONS IN ALL THREE OF THE STATEMENTS MADE UNDER THIS FACT HEADING ASSUME THAT THE WASTE NEEDS TO BE TREATED AND/OR REMOVED. I AGREE THAT IF WE HAVE TO TREAT THE WASTE IT MAY BE MORE COSTLY TO WAIT HOWEVER I DON'T SEE ANY NEED TO REMOVE IT AT ALL. I BELIEVE ENGINEERING SCIENCE HAS REITERATED THEIR POSITION TO YOU IN RECENT MONTHS THAT THE SITE POSES NO RISK AND THAT THE SAFEST OPTION IS TO SIMPLY CAP AND MONITOR. I ALSO BELIEVE THAT THE NEW EPA BILL MOVING THROUGH CONGRESS PREFERS THIS OPTION AS WELL IN SITUATIONS LIKE THE BUCKINGHAM LAND FILL SITE.

FACT: "EPA HAS NOT NAMED THE INDIVIDUAL RESIDENTS OF BUCKINGHAM COUNTY OR THE EMPLOYEES OF THOMASVILLE FURNITURE AS RESPONSIBLE PARTIES."

THE STATEMENT ITSELF IS TRUE ENOUGH BUT YOU OBVIOUSLY KNOW THAT YOUR DECISION WILL HAVE AN ECONOMIC IMPACT ON ALL PARTIES

AR502022

INVOLVED. INDIRECTLY, SHOULD YOU DECIDE ON A COSTLY AND UNNECESSARY CLEAN UP OPTION IT WILL HAVE RAMIFICATIONS FOR ALL POTENTIALLY RESPONSIBLE PARTIES WHETHER THEY BE TAXPAYERS OF BUCKINGHAM COUNTY, EMPLOYEES OF THOMASVILLE FURNITURE OR BOTH.

ALSO, ALTHOUGH I KNOW IT IS THE LAW, I AM STILL INFURIATED THAT A COMPANY LIKE THOMASVILLE THAT ACTED LEGALLY SHOULD HAVE TO PAY FOR ANY CLEAN UP. WHERE WAS THE E.P.A WHEN THIS DUMP WAS LICENSED? HOW WOULD YOU FEEL IF ALL GOVERNMENT EMPLOYEES HAD TO BEAR THE BURDEN OF CLEANING UP THE VARIOUS TOXIC GOVERNMENT SITES AN COULD NOT PASS ALONG THE COST TO SOMEONE ELSE? I WONDER IF YOU WOULD TAKE ANY CONSOLATION IF A STATEMENT WERE MADE TO THE EFFECT THAT "WE CITIZENS CAN'T CONTROL GOVERNMENT LAYOFFS OR ADDITIONAL TAXES THAT YOU WOULD HAVE TO PAY".

FACT: " THE LAW PREFERS TREATMENT; CAPPING IS NOT A TREATMENT."

I HAVE BEEN READING ABOUT THE NEW EPA BILL MOVING THROUGH CONGRESS AND I UNDERSTAND IT TO SAY THAT CAPPING IS A TREATMENT AND IN MANY CASES MAY BECOME THE PREFERRED REMEDY IN SITUATIONS LIKE BUCKINGHAM. SECONDLY, YOUR STATEMENT ASSUMES THAT A PROBLEM EXISTS THAT REQUIRES TREATMENT. I DISAGREE WITH THIS STATEMENT. I BELIEVE THE SITE IS SAFE NOW, WOULD BE EVEN SAFER WITH A NEW CAP AND DEFINITELY DOES NOT NEED TREATMENT. I BELIEVE THAT EVEN SOME OF YOUR MORE RECENT TESTS USING THE "SUMNER MODEL" SHOWED THAT THE PROPOSED IN SITU EVAPORATION IS NOT NEEDED.

OTHER RESERVATIONS I HAVE ABOUT YOUR NEW PROPOSAL ARE:

A) I AM DEFINITELY OPPOSED TO DRILLING THROUGH THE EXISTING CAP TO SAMPLE THE BARREL TRENCH. I AM WONDERING HOW YOU WILL KEEP RAIN, SNOW, ETC. FROM GETTING UNDER THE CAP WHILE THIS IS GOING ON. WOULD THERE BE SOME SORT OF STRUCTURE OVER THE HOLE IN THE CAP?

B) I AM UNCLEAR AS TO HOW LONG IN SITU EVAPORATION CONTINUES AND WHAT GUIDE LINES HAVE TO BE MET TO CONSIDER THE SITE "CLEAN". I WOULD APPRECIATE SOME ADDITIONAL INFORMATION ON THIS TOPIC. SECONDLY, WHAT IF "IN SITU" IS DONE FOR A PERIOD OF TIME AND IMPROVEMENT IS SHOWN BUT NOT ENOUGH. DO YOU CONTINUE IN SITU FOR A LONGER PERIOD OR DO YOU START DIGGING THEN?

IN CONCLUSION, I AM HOPEFUL THAT THIS BUCKINGHAM COUNTY LANDFILL PROBLEM CAN BE RESOLVED BY ADOPTING THE COMMUNITY PREFERRED OPTION OF CAP AN MONITOR ONLY. THIS IS IN FACT THE SAFEST AND MOST COST EFFECTIVE METHOD TO DEAL WITH THIS PROBLEM AND DOES NOT JEOPARDIZE THE HEALTH OF THE LOCAL RESIDENTS. I APPRECIATE YOUR CONSIDERATION OF MY OPINION.

SINCERELY,

Earl B. Repsher
EARL B. REPSHER
204 POCAHONTAS DRIVE
FOREST, VA 24551

AR502023